

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FCS ADVISORS, LLC,

Plaintiff,

—against—

21 Civ. 6995 (PKC)

THEIA GROUP, INC., d/b/a “THORIAN
GROUP” and/or “CYPHERIAN”; THEIA
AVIATION, LLC; and THEIA HOLDINGS A,
INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

CERTIFICATE OF SERVICE

I, Jason D. Angelo, certify as follows:

1. I am Counsel at Reed Smith LLP, which serves as counsel for Michael Fuqua, in his capacity as receiver (the “Receiver”) for the defendants in the above-captioned action. I make this certificate of service based on my personal knowledge as counsel for the Receiver.

2. On August 12, 2023, I caused a true and correct copy of the (i) *Notice of (I) Cancellation of Auction and (II) Designation of Successful Bidder* (the “Cancellation Notice”) (Doc. 364); (ii) *Notice of Motion of Michael Fuqua, as Receiver, for Entry of an Order (I) Authorizing and Approving (A) the Sale of Substantially All of the Receivership Entities’ Assets, Free and Clear of Liens, Claims, Rights, Encumbrances, and Other Interests and (B) Entry Into the Asset Purchase Agreement With LTS Systems, LLC; (II) Further Extending the Receivership Stay; and (III) Granting Related Relief* (the “Sale Motion”) (Doc. 365); (iii) *Memorandum of Law in Support of Sale Motion* (the “Memorandum”) (Doc. 366);¹ and (iv) *Declaration of Michael*

¹ Capitalized terms used but not otherwise defined in this *Certificate of Service* shall have the meanings given to such terms in the Memorandum.

Fuqua, as Receiver, in Support of Sale Motion (the “Receiver Declaration”) (Doc. 367) to be served via CM/ECF on those parties that have entered an appearance in this case.

3. On August 13, 2023, I caused a true and correct copy of the *Declaration of Authorized Signatory* (the “Buyer Declaration” and collectively with the Cancellation Notice, Sale Motion, Memorandum, and Receiver Declaration, the “Sale Documents”) (Doc. 368) to be served via CM/ECF on those parties that have entered an appearance in this case.

4. Attached as Exhibit A hereto is the *Master Service List*, which includes the names, addresses, and email addresses (to the extent such information is available to and known by the Receiver) of the following: (i) Persons that PJT Partners LLP reached out to as part of its process of marketing the Acquired Assets; (ii) Persons known by the Receiver or his advisors to have expressed an interest in purchasing any of the Receivership Assets during the past twelve (12) months, including any Person that submitted an EOI or bid for any of the Receivership Assets; (iii) Persons who have or may have asserted any Lien, Claim, interest, or Encumbrance in the Receivership Assets; (iv) the Receivership Entities’ known secured and unsecured creditors or alleged creditors; (v) applicable government authorities, including, without limitation, federal, state, and local taxing authorities; (vi) the United States Attorney’s Offices for the Southern District of New York and the District of Columbia; and (vii) Rising Sky, LLC.

5. On August 14, 2023, I caused true and correct copies of the Sale Documents to be served via Electronic Mail on all parties listed on the *Master Service List* for which email addresses are known.

6. On August 14, 2023, I caused true and correct copies of the Cancellation Notice and the Sale Motion (without exhibits) to be served via First Class U.S. Mail or Federal Express (International First or International Priority), as applicable, on all parties listed on the *Master*

Service List for which addresses are known. Parties listed on the Master Service List for whom the Receiver does not have email addresses will be served with hard copies of the Cancellation Notice and Sale Motion (without exhibits), each of which provides information on how to obtain copies of the entire set of Sale Documents from the Court's website or for free upon requested directed to the undersigned.

7. On August 15, 2023, I caused full copies of the Sale Documents to be served via **First Class U.S. Mail** on (i) the government authorities (including, without limitation, federal, state, and local taxing authorities) listed on the *Master Service List* and (ii) the United States Attorney's Offices for the Southern District of New York and the District of Columbia.

I certify that the foregoing is true and correct.

Dated: August 15, 2023

By: /s/ Jason D. Angelo
Jason D. Angelo, Esq. (*pro hac vice*)
REED SMITH LLP

*Counsel for Michael Fuqua, in his capacity as
Receiver of Theia Group, Inc., Theia Aviation LLC,
and Theia Holdings A, Inc.*